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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of: )

The Telephone Consumer  
Protection Act of 1991 )

CC Docket No. 92-90

REPLY COMMENTS

BellSouth Corporation, for itself and on behalf of its affiliated companies (collectively "BellSouth"), hereby responds to comments received by the Commission pursuant to its Notice of Proposed Rulemaking ("Notice") that initiated this proceeding.<sup>1</sup>

In its Notice, the Commission proposed regulations to implement the Telephone Consumer Protection Act of 1991 (TCPA), Pub. L. 102-243, 105 Stat. 2394 (1991). The TCPA amended Title II of the Communications Act of 1934, 47 U.S.C. § 201 et seq., by adding a new section 47 U.S.C. § 227, which among other things restricts the use of automatic telephone dialing systems and other techniques for telemarketing purposes. On the whole, the comments tended to support the Commission's proposed regulations, while reflecting a need for clarification of certain aspects of the Commission's proposals.

As BellSouth observed in its comments, the Commission's proposed rule 64.1100(a)(1) virtually restates new

<sup>1</sup> The Telephone Consumer Protection Act of 1991, Notice of Proposed Rulemaking, CC Docket No. 92-90, FCC 92-176 (rel'd April 17, 1992).

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section 227(b)(1)(A) of the Communications Act. That section prohibits the use of automatic telephone dialing systems or artificial or prerecorded voice announcements on calls to any emergency telephone line,<sup>2</sup> to the telephone line of a guest or patient room of a health care facility, to a paging service or other specialized mobile radio service, or to any service for which the called party is charged for the call, unless the call is made for emergency purposes or made with a prior express consent of the called party.<sup>3</sup>

The Cellular Telecommunications Industry Association ("CTIA") expressed concern that a strict interpretation of this section could prevent cellular carriers from making autodialer assisted calls to their customers to monitor such things as customer satisfaction, service quality, or other matters relevant to the management of their operations, without running afoul of the prohibitions. BellSouth suggests that the Commission need not apply section 227(b)(1)(A) so rigidly and that the Commission has the latitude to interpret the statutory exceptions broadly.

For example, the Commission could find that calls placed by a cellular service provider to its customers and

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<sup>2</sup> The TCPA defines emergency lines to include doctors' offices and other health care facilities, poison control centers, and fire protection and law enforcement agencies. 47 U.S.C. § 227(b)(1)(A)(i).

<sup>3</sup> 47 U.S.C. § 227(b)(1)(A).

roamers on its system addressing customer satisfaction, service quality, and other service management functions, particularly if the party receiving the call is not being charged, are aspects of the service to which the customer has subscribed and, therefore, are deemed to be made with the prior consent of the customer. In any event, BellSouth joins CTIA in urging the Commission to do all it can to ensure that cellular providers have the same degree of flexibility in dealing with their customers that other service providers have and to consider every avenue within its authority to correct apparently unintended disparities between the treatment of wire based telecommunications and cellular services.<sup>4</sup>

Other parties were similarly concerned that the statutory exceptions to section 227(b)(1)(A) not be construed too narrowly. For example, Ameritech echoes BellSouth's position that calls placed using an Automated Alternate Billing System (AABS) are not prohibited by the TCPA. Calls utilizing such systems are no different from calls utilizing a live operator during the call set up process. Such systems merely represent a mechanized means

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<sup>4</sup> CTIA points out the expressly authorized exception to the general prohibitions of section 227(b)(1)(B) for calls to residential customers by parties with whom the calling party has an existing business relationship. An unnecessarily strict reading of section 227(b)(1)(A) would create the anomalous result of precluding calls by cellular carriers to their customers' cellular lines, but permitting the same call to be made to the customer's residential phones.

of determining whether a call should be completed as placed. Since such systems are used only to set up a call and not to deliver a substantive message between parties to the call, interaction between the system and the called party should not be considered the "making" of a call prohibited by the TCPA.<sup>5</sup>

Similarly, the Commission should clarify that calls using voice store and forward technologies which are placed to the categories of lines protected by section 227(b)(1)(A) are not prohibited by the TCPA. BellSouth believes that a proper interpretation of the prohibition consistent with legislative history of the Act would be that the prohibition does not apply to calls intended for specific called parties that are stored for later delivery by an intermediate service provider. For purposes of this section, the Commission should view such "time shifting" of delivery of the call to be the same as delivery of the original call. Alternatively, the Commission should clarify that the prohibition applies to the party originally initiating (*i.e.*, "making")<sup>6</sup> the call and that intermediate voice store and forward service providers are not responsible under the

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<sup>5</sup> See 47 U.S.C. 227(b)(1) ("It shall be unlawful for any person within the United States -- (A) to make any call ....") (emphasis added).

<sup>6</sup> See note 5, *supra*.

TCPA for knowing or determining the nature of the party being called.<sup>7</sup>

With respect to the Commission's proposals for minimizing unwanted live telephone solicitations, most parties seem to recognize that the most practical and administratively feasible approach would be to require company specific "do not call" lists. Such an approach appears to be most responsive to telephone subscribers' individual preferences. It also would be easy for subscribers to utilize and cost efficient for telemarketers to implement. Because it is responsive to subscribers' individual choices, it is preferable over a national "do not call" list, which would have neither the flexibility nor administrative efficiencies associated with company specific lists.

A few parties suggest that the administrative difficulties associated with a national database can be overcome with implementation of SS7 networks and LIDB-like databases. Such an arrangement would represent a "network based" solution in combination with a national "do not call" list. While such a proposal has some superficial appeal, further study should be required before the proposal receives any Commission endorsement.

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<sup>7</sup> Indeed, the Commission should clarify that for all purposes under the TCPA the party initiating the call is the party to whom the prohibitions would apply.

Moreover, as BellSouth and others stated in their comments, costs of implementation and enforcement of the TCPA should not fall on carriers. If there develops a market need for a solution that can be provided by carriers, carriers should have the opportunity to respond to that need. Of course, it should be the telephone companies who determine whether there is sufficient demand to justify offering such a capability and whether the costs of such an offering can be recovered from the cost causers.

**CONCLUSION**

For the reasons stated above and in its comments, BellSouth encourages the Commission to implement the prohibitions of the TCPA in a manner that gives flexible interpretation to the statutory exceptions consistent with the legislative history. BellSouth also encourages the Commission to ensure that carriers not be saddled with the cost and burden of providing network solutions to unwanted telephone solicitations when other less costly, but equally effective means are available.

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CERTIFICATE OF SERVICE

I hereby certify that I have this 25th day of June, 1992 serviced all parties to this action with a copy of the foregoing REPLY COMMENTS by placing a true and correct copy of same in the United States mail, postage prepaid, to those persons listed on the attached service list.

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